

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE REPUBLIC OF IRAQ, including as :
PARENS PATRIAE in behalf of the :
CITIZENS of the REPUBLIC OF IRAQ :
:

Plaintiff, :

v. :

ABB AG, et al. :

Defendants. :
-----X

CASE NO. 08-CV-5951-GEL
ECF CASE

MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

2010 SEP 2 PM 1:31
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Walter Loughlin, a member in good standing of the bar of this Court, hereby move for an order allowing the admission *pro hac vice* of

Applicant Names: **Timothy Zeiger**
Firm Names: Shackelford, Melton & McKinley, LLP
Addresses: 3333 Lee Parkway
City/State/Zip: 10th floor
Phone Numbers: Dallas, Texas 75219
Fax Numbers: (214) 780-1400
Email Addresses: (214) 780-1401
tzeiger@shacklaw.net

Leland de la Garza
Shackelford, Melton & McKinley, LLP
3333 Lee Parkway
10th floor
Dallas, Texas 75219
(214) 780-1400
(214) 780-1401
ldelagarza@shacklaw.net

Timothy Zeiger is a member in good standing of the Bar of the State of Texas and the Bar of the State of Wisconsin.

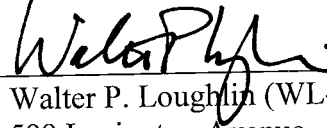
9/3/10 5:58 PM

Leland de la Garza is a member in good standing of the Bar of the State of Texas.

Dated: New York, New York
September 1, 2010

K&L GATES LLP

By: _____



Walter P. Loughlin (WL-4760)

599 Lexington Avenue

New York, NY 10022-6030

Phone: (212) 536-4065

Fax: (212) 536-3901

E-mail: walter.loughlin@klgates.com

Attorneys for Defendant

Woodhouse International, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CASE NO. 08-CV-5951-GEL
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AFFIDAVIT OF WALTER P.
LOUGHLIN IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

STATE OF NEW YORK)

COUNTY OF NEW YORK)

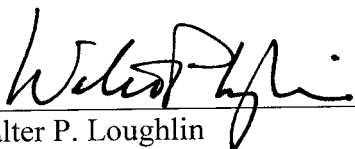
WALTER P. LOUGHLIN, being duly sworn, deposes and says:

1. I am a member in good standing of the bar of this court, and of K&L Gates, counsel for Defendant Woodhouse International, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the instant motion to admit Timothy Zeiger and Leland de la Garza as counsel *pro hac vice* to represent Defendant Woodhouse International, LLC, in this action.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April, 1999. I am also admitted to the bar of the United States District Court for the Southern and Eastern Districts of New York, and am in good standing with these Courts.
3. Timothy Zeiger is a partner with the firm of Shackelford, Melton & McKinley, LLP, in Dallas, Texas. He started with the firm on January 1, 2002. I have found Mr. Zeiger to be a skilled attorney and a person of integrity. He is experienced in Federal

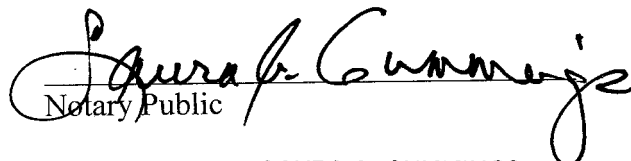
practice and is familiar with the Federal Rules of Procedure. Accordingly, I am pleased to move for the admission of Timothy Zeiger, *pro hac vice*. In support of this motion, I submit the Certificate of Good Standing for Timothy Zeiger from the State of Texas and the Certificate of Good Standing from the State of Wisconsin (both attached hereto as Exhibit "A").

4. I respectfully submit a proposed order granting the admission of Timothy Zeiger, *pro hac vice* (attached hereto as Exhibit "B").
5. Leland de la Garza is a partner with the firm of Shackelford, Melton & McKinley, LLP, in Dallas, Texas. He started with the firm on January 1, 2006. I have found Mr. de la Garza to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Accordingly, I am pleased to move for the admission of Leland de la Garza, *pro hac vice*. In support of this motion, I submit the Certificate of Good Standing for Leland de la Garza from the State of Texas (attached hereto as Exhibit "C").
6. I respectfully submit a proposed order granting the admission of Leland de la Garza, *pro hac vice* (attached hereto as Exhibit "D").

WHEREFORE, it is respectfully requested that the motion to admit Timothy Zeiger and Leland de la Garza *pro hac vice* to represent Defendant Woodhouse International, LLC in this action be granted.


Walter P. Loughlin

Subscribed and sworn to before me this 1st day of September, 2010.


Notary Public

LAURA A. CUMMINGS
Notary Public, State of New York
No. 01-CU4912663
Qualified in New York County
Commission Expires March 12, 2014

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Timothy David Zeiger

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 30th day of October, 1981.

I further certify that the records of this office show that, as of this date

Timothy David Zeiger

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand

and the seal of the Supreme Court of
Texas at the City of Austin, this, the
9th day of August, 2010.

BLAKE HAWTHORNE, Clerk

by 
Brad Sonogo, Deputy Clerk

No. 0809B



A. John Voelker
Acting Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215

P.O. Box 1688

Madison, WI 53701-1688

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TTY: 800-947-3529

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<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

The Deputy Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

TIMOTHY D. ZEIGER

was admitted to practice as an attorney within this state on January 7, 2004 and is presently in good standing in this court.

Dated: August 13, 2010

A handwritten signature in black ink, reading "Robert J. Bushey". The signature is written in a cursive style.

Deputy Clerk of Supreme Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff, :
v. :
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ABB AG, et al. :
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Defendants. :
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**CASE NO. 08-CV-5951-GEL
ECF CASE**

**ORDER FOR ADMISSION
PRO HAC VICE**

Upon the motion of Walter P. Loughlin, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant Name: **Timothy Zeiger**
Firm Name: Shackelford, Melton & McKinley, LLP
Address: 3333 Lee Parkway
City/State/Zip: 10th floor
Phone Number: Dallas, Texas 75219
Fax Number: (214) 780-1400
Email Address: (214) 780-1401
tzeiger@shacklaw.net

is admitted to practice *pro hac vice* as counsel for Defendant Woodhouse International, LLC in the above captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
September ___, 2010

U.S. District Judge

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Leland Curtis De La Garza

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 2nd day of November, 1984.

I further certify that the records of this office show that, as of this date

Leland Curtis De La Garza

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand

and the seal of the Supreme Court of
Texas at the City of Austin, this, the
9th day of August, 2010.

BLAKE HAWTHORNE, Clerk

by *Brad Sonego*
Brad Sonego, Deputy Clerk

No. 0809A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**CASE NO. 08-CV-5951-GEL
ECF CASE**

**ORDER FOR ADMISSION
PRO HAC VICE**

Upon the motion of Walter P. Loughlin, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant Name: **Leland de la Garza**
Firm Name: Shackelford, Melton & McKinley, LLP
Address: 3333 Lee Parkway
City/State/Zip: 10th floor
Phone Number: Dallas, Texas 75219
Fax Number: (214) 780-1400
Email Adresse: (214) 780-1401
ldelagarza@shacklaw.net

is admitted to practice *pro hac vice* as counsel for Defendant Woodhouse International, LLC in the above captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
September ___, 2010

U.S. District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff, :

v. :


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CASE NO. 08-CV-5951-GEL
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**CERTIFICATE OF
SERVICE**

I, Samantha J. Katze, hereby certify that on September 2, 2010, I caused true and correct copies of the foregoing (1) Motion to Admit Counsel *Pro Hac Vice* and (2) Affidavit of Walter P. Loughlin in Support of Motion to Admit Counsel *Pro Hac Vice* to be served via First Class mail upon all counsel on the attached Service List.



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